



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

July 28, 2021

**By ECF**

Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Balducci*, 21 Cr. 355 (RMB)**

Dear Judge Berman:

The Government writes respectfully in advance of the upcoming status conference in this case, which is currently scheduled for August 2, 2021. Defense counsel has advised that the defendant requires additional time to review discovery, and the parties also seek additional time to discuss a potential pretrial resolution. Accordingly, the parties respectfully request that the August 2 conference be adjourned for approximately thirty (30) days to a date and time convenient for the Court.

For similar reasons, including allowing the defendant to continue reviewing discovery and to permit the parties additional time to discuss a potential pretrial disposition, the Government further requests that time be excluded under the Speedy Trial Act from August 2, 2021, through the date of any newly-scheduled proceeding. *See* 18 U.S.C. § 3161(h)(7)(A). The Government has conferred with defense counsel, who consents to the adjournment and exclusion of time.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney  
Southern District of New York

By: /s/ Jarrod L. Schaeffer  
Jarrod L. Schaeffer  
Assistant United States Attorney  
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Application granted. Conference  
adjourned to Wednesday, September  
22, 2021 at 10:30 AM. Time is excluded  
pursuant to the Speedy Trial Act for the  
reasons set forth in this letter.

SO ORDERED:

Date: 7/28/21

Richard M. Berman  
Richard M. Berman, U.S.D.J.